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June 19, 2017

VIA ECF

The Honorable Lewis A. Kaplan United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

Re: Chevron Corp. v. Donziger, No. 11-cv-691 (LAK)

Dear Judge Kaplan:

I respectfully write as counsel for Plaintiff Chevron Corporation ("Chevron") to apprise the Court of today's denial of Defendants' petition for certiorari by the Supreme Court of the United States. *See* Order List (June 19, 2017), https://www.supremecourt.gov/orders/courtorders/061917zor_6537.pdf.

In view of the Supreme Court's order, Chevron respectfully requests that the Court reactivate Chevron's motion for attorneys' fees and bill of costs, which the Court previously deferred until "the determination of the petition [for certiorari] and any ensuing consideration by the Supreme Court." Dkt. 1916; Dkt. 1921.

Furthermore, Chevron requests that the Court require Steven Donziger to comply with this Court's March 4, 2014 Judgment, which required him to "execute in favor of Chevron a stock power transferring to Chevron all of his right, title and interest in his shares of Amazonia," the entity he created to try to shield any judgment proceeds from both U.S. and Ecuadorian authorities. Dkt. 1875 ¶ 3. The Court amended this order to require Donziger to transfer his Amazonia shares to the Clerk of the Court "pending the determination of the appeal in this case." Dkt. 1901 at 32. Donziger appears never to have complied with the Court's order. There is no justification for Donziger's continued violations, and Chevron respectfully requests that the Court order Donziger to comply forthwith, or else face sanctions.

Respectfully,

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Randy M. Mastro